

May 4, 2003
Savan Kong
8400 54th Ave South
Seattle, WA 98118

REF: 46 CFR Part 4 (USCG-2001-8773)-28

Dear Sir:

I am writing in regards to the proposal that requires that all commercial vessels carry an alcohol-testing device. I believe that this rule is neither too strict nor general. Many vessels, like all other modes of transportation, have a sense of responsibility to themselves and others while in motion. Not only will the alcohol-tester help captains and pilots ensure more responsibility, but it will also keep the waters safer for passenger ships, swimmers, and all other animals. If oceangoing vessels already mandate an alcohol testing device, what exempts commercial boats from doing the same? Any testing, no matter how small, is better than no testing at all. Safety should be the first and utmost concern when piloting ships – especially with other passengers.

Having a tester is not a burden; I believe that this is a great step to improving safety in the waters. And if truly effective, this plan should also be implemented in all other modes of transportation.

However, having supported the proposal, I do think that the proposal is vague in many places. For example, the implementation of the test and recording should be outlined in greater detail. As it stands, I believe that it is too ambiguous to be applied practically across all commercial vessels.

Thank You,
Savan Kong